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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MONDRE JAWAN PALMER,

Defendant.

**SEALED
CRIMINAL INDICTMENT**

Case No. 2:24-cr-00104-GMN-NJK

VIOLATIONS:

Count One

18 U.S.C. §§ 922(a)(1)(A), 923(a) and
924(a)(1)D - Engaging in the Business of
Dealing or Manufacturing Firearms Without
a License

Counts Two – Fourteen

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
False Statement in Acquisition of Firearm

THE GRAND JURY CHARGES THAT:

COUNT ONE

Engaging in the Business of Dealing or Manufacturing Firearms Without a License

Beginning from a time unknown but no earlier than on or about May 7, 2019, and
continuing to on or about January 4, 2024, in the State and Federal District of Nevada,

MONDRE JAWAN PALMER,

defendant herein, not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNTS TWO-FOURTEEN

False Statement in Acquisition of Firearm

On or about the dates listed in the chart below, in the State and Federal District of Nevada,

MONDRE JAWAN PALMER,

defendant herein, in connection with the acquisition of the firearms described below from the below-listed licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code (the "Dealer"), knowingly made false and fictitious written statements to the Dealer, which were intended to deceive the Dealer as to a fact material to the lawfulness of each such firearm sale to the defendant under chapter 44 of Title 18; to wit: the defendant completed and executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein the defendant represented that he was the actual transferee/buyer of the firearms listed on the form, when in fact, and as the defendant well knew, he was not the actual transferee/buyer of the firearms and was acquiring the firearms on behalf of another person and/or for sale to a third party:

<u>Count</u>	<u>DATE</u>	<u>FFL</u>	<u>FIREARM(S)</u>
2.	01.04.24	Sportsman's Warehouse	SCCY, CPX-2, 9, Pistol, Serial Number: C495413
3.	11.15.23	Sportsman's Warehouse	Kel-Tec, P17, 22, Pistol,

1			Serial Number: 23GOU19
2	4.	09.15.23	Sportsman's Warehouse
3			SCCY, DVG-1, 9, Pistol, Serial Number: D023623
4	5.	08.15.20	Bargain Pawn
5			1. Taurus, G2C, 9, Pistol, Serial Number: ABH766789
6			2. Taurus, G2C, 9, Pistol, Serial Number: ABG732482
7			
8	6.	07.22.20	Spartan Arms
9			1. Taurus, G2C, 9, Pistol, Serial Number: ABG716258
10			2. Glock, 43, 9, Pistol, Serial Number: ADXZ857
11			
12	7.	05.08.20	Fallout Firearms
13			RG Industries, RG14, 22, Revolver, Serial Number: L809835
14	8.	07.22.19	Bargain Pawn
15			Taurus, G2C, 9, Pistol, Serial Number: TGU49680
16	9.	07.12.19	2 nd Amendment
17			1. SCCY, CPX-2, 9, Pistol, Serial Number: 817090
18			2. SCCY, CPX-2, 9, Pistol, Serial Number: 817089
19			
20	10.	07.10.19	Bargain Pawn
21			1. Taurus, G2C, 9, Pistol, Serial Number: TMR39943
22			2. Kel-Tec, P11, 9, Pistol, Serial Number: 70125
23			
24			

11.	06.28.19	Guns World	1. Taurus, G2C, 9, Pistol, Serial Number: TMR82675 2. SCCY, CPX-2, 9, Pistol, Serial Number: 755772
12.	06.27.19	Fallout Firearms	1. SCCY, CPX-2, 9, Pistol, Serial Number: 805553 2. SCCY, CPX-2, 9, Pistol, Serial Number: 808947
13.	06.21.19	2 nd Amendment	1. Taurus, G2C, 9, Pistol, Serial Number: TLZ58302 2. SCCY, CPX-2, 9, Pistol, Serial Number: 761015
14.	05.07.19	Fallout Firearms	Jimenez Arms, JA Nine, 9, Pistol, Serial Number: 421829

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).


DATED: this 07 day of May 2024.

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney


DAVID KIEBLER
Assistant United States Attorney